

CHARLIE W. YU (SBN 268233)
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Attorney for Witnesses
Green Oasis, LP, Pacific Golden Asia LLC, Moon Irrevocable Trust, including Kenesha Fudge
as Trustee for Moon Irrevocable Trust, and Giovanni Torocca

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

RICHARD TOM,
Debtor.

Case No. 19-31024

Chapter 7

Adv. Proc. No. 19-3065

MARK NG, KENDALL NG, and LORAINE
WONG,

Plaintiffs,

v.

RICHARD TOM,
Defendant.

DECLARATION OF CHARLIE W. YU IN
SUPPORT OF MOTION TO WITHDRAW
AS COUNSEL

Date: August 4, 2022
Time: 2:00 pm
Courtroom: 19
Judge: Hon. Hannah L. Blumenstiel

DECLARATION OF CHARLIE W. YU

1. I, Charlie W. Yu, declare as follows:

2. I am an attorney at Essential Law Group, PC, formerly Law Offices of Charlie W. Yu. The matters stated below are based upon my personal knowledge. If called as a witness, I could and would testify to the matters set forth below.

3. I was retained for the limited purpose of defending the depositions of Green Oasis, LP and some of its partners. The deponents include Green Oasis, LP, Pacific Golden

Asian, LLC, Moon Irrevocable Trust, including Kenesha Fudge as Trustee for Moon Irrevocable Trust, and Giovanni Torocca.

4. I attended the depositions of Green Oasis, LP on February 16, 2022, February 24, 2022, and March 2, 2022.

5. Thereafter, Ms. Kenesha Fudge indicated that Green Oasis, LP no longer needed the services of Charlie W. Yu to defend the depositions of Green Oasis, LP and its partners, including for Green Oasis, LP, Pacific Golden Asian, LLC, Moon Irrevocable Trust, including for herself as Trustee for Moon Irrevocable Trust, and for Giovanni Torocca.

6. Thereafter, I confirmed with Giovanni Torocca that he did not need my services to defend his deposition. I did not defend his deposition and have not participated in any depositions other than the initial depositions of Green Oasis, LP.

7. I have not agreed to defend any more depositions for Green Oasis, LP or its partners.

8. Ms. Kenesha Fudge on behalf of Green Oasis, LP and its partners have stipulated for me to withdraw as counsel. The Stipulation is filed with the motion.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

DATED: June 29, 2022

ESSENTIAL LAW GROUP

/s/Charlie Yu

CHARLIE W. YU
Attorney for Witnesses Green Oasis, LP,
Pacific Golden Asia LLC, Moon Irrevocable
Trust, including Kenesha Fudge as Trustee
for Moon Irrevocable Trust, and Giovanni
Torocca